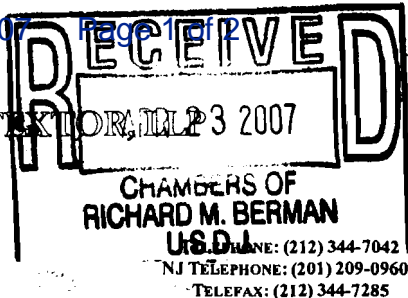


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**MEMO ENDORSED**

NEW JERSEY OFFICE  
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A. J. MARINO  
OF COUNSEL

BYRON KING CALLAN  
(1914-1992)  
VICTOR S. CICHANOWICZ  
(1918-1989)

Adjourned to 6/22/07 @  
9:30 AM

April 20, 2007  
BY HAND

**SO ORDERED:**  
Date: 4/23/07 Richard M. Berman  
**Richard M. Berman, U.S.D.J.**

The Hon. Richard M. Berman, U.S.D.J.  
The U.S. Courthouse  
500 Pearl Street  
New York, NY

RE: Nippon Yusen Kaisha v. Zircon Logistics  
07 Civ. 2874 (RMB)  
Our File: 8826/JDM

Your Honor:

We are the attorneys for plaintiff in the above captioned matter which was filed on April 10, 2007. Service has not yet been made on the defendants. We write to ask for a 30 day adjournment of the pretrial conference now scheduled for May 23, 2007 at 9:30 AM. No prior adjournments have been granted or requested. The reason for the adjournment is as follows.

Plaintiff brought this suit in an attempt to obtain security for its claim by means of a maritime attachment under Supplemental Admiralty Rule B and 9 U.S.C. 8. The claims pleaded in the complaint are now the subject of a shortened maritime arbitration before a single arbitrator named Svend Hansen of the Society of Maritime Arbitrators. The Arbitrator has just issued a scheduling order dated April 19, 2007 (copy attached) which indicates that the arbitral award could well be made before the requested adjournment date, thus mooted the need for litigation. We ask that the adjournment be without prejudice to plaintiff's right to seek Rule B attachment security.

Respectfully,  
CICHANOWICZ CALLAN KEANE VENGROW  
& TEXTOR, LLP

By: Joseph De May, Jr.

USDC SDNY  
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DOC #:  
DATE FILED: 4/23/07

**Svend Hansen, Jr.**  
6 Holly Lane  
Rye, New York 10580

**Tel: 212-763-3423**  
**Fax: 212-363-3980**  
**svend.hansen@hagedorn.com**

April 19, 2007

Mr. John McLean  
Zircon Group  
5750 Timberlea Blvd., Unit 2  
Mississauga, Ontario, L4W5N8  
CANADA

Joseph DeMay, Jr., Esquire  
Cichanowicz, Callan, Keane, Vengrow & Textor, LLP  
61 Broadway, Suite 3000  
New York, NY 10006-2802

**Re: NYK Line (North America) Inc. v. Zircon Logistics, Inc. Freight Charges  
NYK B/L's NYKS475432439; NYKS475438417; NYKS475438958**

Gentlemen:

In accordance with the shortened arbitration procedure the schedule for proceedings shall be as follows:

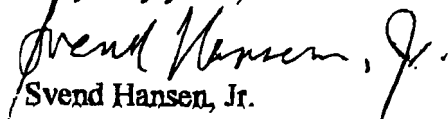
Claimant NYK shall submit its initial statement of claim with all supporting documents as promptly as possible.

Respondent Zircon shall submit its response and any counterclaim with all supporting documents within 20 days of receipt of claimant's submission.

In the event of a counterclaim, claimant NYK shall respond within 20 days of receipt thereof.

Short replies by both parties will be considered, if required.

Very truly yours,

  
Svend Hansen, Jr.